

United States District Court
Western District of Tennessee

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David Chester Faulkner

v. Plaintiff

Henry Steward et. Al;

Defendants

Case # 2-10-CV-02722-JDT-dkr

July TRIAL Demand

THOMAS M. GOULD
CLERK, U.S. DISTRICT COURT
W.D. OF TN, MEMPHISMotion To File Supplemental
Complaint

Comes now the Plaintiff in the Above styled case and Asks that the Court grant him leave to supplement his complaint. New evidence has come into the Plaintiffs Awareness By Reviewing his Institutional and Medical Files At the Morgan County Correctional Complex.

ON November 25th, 2009 Plaintiff was severely beaten by the Defendants in this case LT Mullins, Cpl. Sunderman, CA McClain, C/o Webb, and C/o Patton, upon the orders of Warden Steward and Warden Mills.

Plaintiff now knows from the Attached "Exhibit A" that Nurse Cindy Johnson and Nurse Hope Smith participated in the violation of Plaintiffs Eighth Amendment rights by denial of medical treatment and deliberate indifference to his serious medical needs.

In violation of Plaintiff's Eighth Amendment Rights.

Nurses Johnson and Smith ordered that the Plaintiff was "OK" and could be left in the floor, hog tied in restraints even though it was plainly aware that Plaintiff has a dislocated shoulder, numerous fractures of the face, and a loss of consciousness.

In Exhibit B (Attached) Nurse Johnson States "Release to Security to Place in Security Restraints"

In Exhibit C (Attached) it becomes obvious that Nurse Johnson and Nurse Smith were negligent in their care of Plaintiff when Doctor Frederick Cole MD orders the Plaintiff sent to Lauderdale Hospital for "Probable Dislocation of (R) Humerus, Possible (R) Facial Fracture"

In conclusion, Nurse Cindy Johnson and Nurse Hope Smith were aware that Plaintiff was severely injured, yet they choose to go along with the other Defendants in this case and inflict cruel and unusual punishment upon the Plaintiff. Plaintiff request that this Court order

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that this supplemental complaint can be added to this Action, and that Nurse Cindy Johnson and Hope Smith be served process.

This 7th Day of August, 2011

David Faulkner
Pro se Plaintiff